



Safeguarding Policy

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Section 1: Introduction

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and supporting them to optimise life chances.

As an education provider, we hold safeguarding as a key priority, ensuring that we are looking out for the welfare of all of our learners and colleagues and providing a safe space for individuals to report a concern about themselves or someone else.

We are committed to supporting our learners and colleagues to live, work and learn in a safe environment, free from harm, exploitation and abuse.

Our safeguarding standards and behaviours seek to underpin safeguarding in all our practices and are derived from section 11 of the Children Act (2004) and the Care Act (2014) as well as the guidance provided in the government publications:

- Keeping Children Safe in Education (KCSiE) (2025)
- Prevent Duty Guidance for England and Wales (2023)
- Child Protection and Safeguarding Policy Education Scotland (2023)
- Prevent Duty Guidance: Guidance for specified authorities in Scotland (2024)

Section 2: The Prevent Duty

We recognise that we have requirements under the Prevent Duty, to have due regard to prevent people from being drawn into terrorism, supporting terrorism or being drawn into extremism.

We understand that the key objectives of the Prevent Duty are to :

- tackle the ideological causes of terrorism
- intervene early to support people susceptible to radicalisation
- enable people who have already engaged in terrorism to disengage and rehabilitate

We see these objectives as an integral part of our safeguarding policy and processes. Therefore, where a concern is raised which relates to a learner or employee displaying behaviours that may relate to radicalisation or an act of terrorism, we report and act upon this concern using the safeguarding reporting process.

We have a Prevent Duty Risk Assessment - a working document to help us to navigate, assess and manage the associated risks which may impact our learners who are geographically spread.

How we work to support the objectives of the Prevent Duty?

- Use the Risk Assessment document as a tool to navigate changes in risk
- Remain vigilant and report concerns through the safeguarding process

- Inform and promote shared values with learners and create opportunities for discussion and debate.
- Challenge and educate learners who display behaviour that could be interpreted as discriminatory
- Provide guidance and support to learners who may be vulnerable and ensure they are aware of how extremism and radicalisation may impact them as learners and employees.
- Where required, refer concerns and utilise referral to the Channel process

Section 3: Our safeguarding responsibilities as an Education Provider

- To provide open channels of communication to all learners so they can effectively raise a safeguarding concern.
- To offer support, guidance and education to all learners so they know how to raise a concern or ask for support.
- To keep up to date with our statutory duties towards the welfare of children and vulnerable adults.
- To create and maintain our reporting arrangements and safeguarding records.
- To ensure all staff remain informed and confident in their knowledge and skills so they:
 1. remain vigilant in identifying when a learner maybe at risk
 2. know how to report the concern
 3. provide effective support, guidance and education to all learners.

How we support our learners and their employers

We provide guidance and information to employers during the initial Apprenticeship programme negotiation process to ensure they understand their responsibilities and our responsibilities relating to safeguarding.

We provide all learners with the contact details of the Designated Safeguarding Lead so they have a direct channel of communication to report a concern.

We engage all learners in a comprehensive induction programme which includes safeguarding, the Prevent duty and fundamental values of living in modern day Britain.

We embed further learning in a contextualised and relevant manner to enable learners to explore the wider context of safeguarding and associated topics and increase their understanding and confidence.

We share a monthly “Awareness Newsletter” providing learners and employers with regular updates relating to safeguarding, the prevent duty, EDI and fundamental values to continue to promote and engage them with events and activity in the wider community.

Section 3: Our safeguarding responsibilities as an Employer

- To ensure all staff (including associates, consultants, volunteers and subcontractors) have completed the appropriate disclosure checks and are suitable to be working with young people and adults and to maintain a SCR (Single Central Record) which records this information.
- To ensure all employees feel safe and supported in their role and have the knowledge and confidence to raise a safeguarding concern.
- To ensure all employees remain updated and aware of relevant activity and national events which may impact them or their learners.
- To ensure all associates, consultants and volunteers feel supported and informed about their role and responsibilities and remain appropriately updated.
- To develop a culture of vigilance, awareness, care and support within the organisation which is shared and developed with learners.
- To ensure we have appropriate filtering and monitoring of our IT systems to prevent the downloading of, or access to, inappropriate material.

How we support our staff and sub-contractors

All staff (including associates, consultants and volunteers) undertake annual mandatory training to update their knowledge and understanding of safeguarding and the Prevent duty.

We provide all staff with the contact details of the Designated Safeguarding Lead so they have a direct channel of communication to report a concern.

All subcontractors are required to ensure they undertake annual mandatory training in safeguarding and the Prevent duty

All staff and subcontractors are invited to quarterly Safeguarding update meetings

We share a central resource folder to provide staff with easy access to safeguarding report forms, safeguarding guidance and teaching and learning resources to share with learners.

We share a monthly “Awareness Newsletter” providing tutors/coaches with regular updates relating to safeguarding, the prevent duty, EDI and fundamental values to continue to promote and embed learning on a regular and relevant basis.

Section 4: Safe use of IT systems, GDPR compliance and AI use

We recognise the responsibility of ensuring the safe use of IT systems and recording of data.

We recognise the rising digital threats presented through accessing and sharing misinformation, disinformation (including conspiracy theories) and the use of Generative Artificial Intelligence.

Specific responsibilities are detailed in the IT Acceptable Use Policy, Information Security Policy, Access Control Policy, Data Management Policy and AI Use Policy, which all staff must adhere to.

The AI Use Policy for Apprentices, implemented in June 2025, details the expectations of Apprentices in their use of generative Artificial Intelligence.

Appropriate web filtering is in place to ensure timely alerts of inappropriate activity and firewalls are in place to prevent downloading of inappropriate or high-risk information.

Learners do not access the IT system of Genius People. All learner data is stored and processed using the OneFile E-portfolio application.

OneFile are ISO27001, cyber essentials and cyber essentials plus accredited and externally audited on an annual basis.

All GDPR policies are signed to the ISO27001 information security standard.

Section 5: Roles and Responsibilities

Our Governor

provides challenge, reflection and support to the directors, managers and DSL to ensure our approach to safeguarding remains effective.

Our Directors

ensure we have effective policies, and these are implemented and followed. They are responsible for ensuring that sufficient time and resources are allocated to employees to carry out their responsibilities.

Our Designated Safeguarding Lead

holds ultimate accountability for ensuring safeguarding arrangements for both learners including apprentices, staff and associates. They also ensure that safeguarding matters are central to the strategic management of Genius People. The DSL is an experienced and qualified practitioner whose role is to:

- be available as the key contact to actively respond to any safeguarding concern
- maintain appropriate and secure record keeping of all safeguarding concerns raised
- monitor processes to ensure the SCR is updated and accurate

- maintain links with Local Safeguarding Boards, the Multi Agency Safeguarding Hub and Prevent Coordinators
- lead meetings and CPD sessions for staff
- inform and advise all parties on legislation changes and current safeguarding themes
- plan and implement training
- review procedures and policies on a timely basis
- maintain own CPD to ensure their role can be fulfilled competently
- support staff with concerns relating to learner welfare, signpost and offer guidance

Our Tutors/Coaches (including associates, consultant tutors and volunteers)

are responsible for:

- reporting safeguarding concerns to the DSL in a timely manner
- completing mandatory training and attending regular update meetings to maintain currency of knowledge and skills relating to safeguarding
- ensuring their learners fully complete their induction learning in a timely manner and check their understanding of safeguarding and the Prevent duty
- checking in with learners on a regular basis to ensure their safety and welfare
- embed wider learning associated with safeguarding, the Prevent Duty and fundamental values of living in modern day Britain to develop knowledge and understanding of how these impact learners in their work and life.

Our Support Team

are responsible for:

- reporting safeguarding concerns to the DSL in a timely manner
- completing mandatory training and attending regular update meetings to maintain currency of knowledge and skills relating to safeguarding
- remaining vigilant when liaising with learners and processing application forms and other learner documentation to identify where a potential support issue may arise
- ensuring the relevant processes for disclosure checks are completed for every employee in a timely manner and records are collated and updated, including the SCR

Our Sub Contractors

Subcontractors are:

- expected to complete and actively work towards a Safeguarding action plan which ensures they are meeting all expected protocols in teaching and supporting our learners.
- required to complete mandatory training and attending regular update meetings to maintain currency of knowledge and skills relating to safeguarding.

- obliged to alert the DSL when a safeguarding concern has been raised with a learner of Genius People, even though they may be actioning the concern through their own safeguarding reporting channels.

Appendix 1 – Definitions

1. Child protection

Child protection refers to the processes involved in consideration, assessment and planning of required action, together with the actions themselves, where there are concerns that a child may be at risk of harm. Child protection guidance provides overall direction for agencies and professional disciplines where there are concerns that a child may be at risk of harm. Child protection procedures are initiated when police, social work or health professionals determine that a child may have been abused or may be at risk of significant harm.

2. Safeguarding

Safeguarding encompasses promoting the welfare of children, young people and vulnerable adults, protecting them from maltreatment and abuse, promoting health and development, ensuring safety and care, and providing support to optimise life chances.

3. Types of abuse



4. Additional Safeguarding-related Risks

Child sexual exploitation	Substance misuse	Fabricated and induced illness	Forced marriage	Gang-related behaviour
Female genital mutilation (FGM)	Gender based violence	•County Lines	“Child upon child” / Peer to peer abuse	Trafficking and modern slavery
Mental health illness	Incels	Radicalisation and terrorist related activity	PTSD and past trauma	Upskirting
People seeking asylum	Looked after children / care leavers	Sexting	Deep fakes	Children missing education

5. **A Child** is defined as anyone under the age of 18.

6. **An adult at risk /vulnerable adult** is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. This could be due to, and not limited to, any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service to support their needs
- Receiving support due to their age or disability
- Living in residential accommodation as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mothers living in residential care
- Persons under supervision of the probation service

7. Other vulnerabilities

It is important to note that a person may be deemed at higher risk of a potential safeguarding concern due to other factors, such as:

- Poor numeracy and literacy skill or specific learning need

- Unsupportive home environment
- English not the first language
- Unsupportive employer
- Underrepresented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need

8. Extremism

The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calls for the death of members of the British armed forces.

9. Terrorism

An action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

10 Radicalisation

People can be drawn into violence, or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of several factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology.

11. CHANNEL

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalization or personal vulnerabilities.

Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals.

Appendix 2 – Safeguarding Referral Form

OUR DETAILS

Name:

Position / relation to child:

Phone number:

Address:

Email:

CONTACT DETAILS FOR WELFARE OFFICER

Name:

Email:

Phone number:

LEARNER DETAILS

Name:

Date of Birth:

Sex:

M

F

Other relevant information about the learner: (e.g. mental and physical health, or any other contextual information)

PARENT/GUARDIAN/CARER DETAILS

Name:

Have the child's parent(s)/Guardian(s)/Carer(s) been informed of the incident?

Y

N

Email:

Additional Information:

DETAILS OF THE CONCERNS/ALLEGATIONS

Are you reporting concerns raised by:

Yourself

Someone else

If reporting concerns raised by someone else, please provide additional information.

Name:

Position/ Related to child

Phone Number:

Address:

Email:

Date and time of incident:

Date and time of allegation:

Actions taken to date: (please give details of who else has been informed, including parents where appropriate, and any relevant contact details)

DETAILS OF THE INCIDENT OR CONCERN

Details of the concern: (be clear which details are fact and which are speculation. Remember to record any injuries)

Details of who was involved: (include any witnesses and any people who are allegedly involved in the abuse/harm)

What the child said, if applicable (remember to use their exact words)

Signed:

Date: